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July 12, 2002

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Quarterly Report
CC Docket 94-102
Broadband PCS Station KNLF641, Fargo, ND
Broadband PCS Station KNLF642, Grand Forks, ND
Transmission of E911 Calls from TTY Devices**

Dear Ms. Dortch:

On behalf of Minnesota PCS Limited Partnership ("Minnesota PCS") and pursuant to the directive contained in the Commission's *Fourth Report and Order* in CC Docket No. 94-102, FCC 00-436 (*rel.* December 14, 2000), we are submitting its Quarterly Report addressing the requirements for digital wireless systems to provide TTY access to E-911 emergency calling systems.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Sincerely,



John A. Prendergast
Kathleen A. Kaercher
Counsel to Minnesota PCS
Limited Partnership

MINNESOTA PCS LIMITED PARTNERSHIP
13810 24th Avenue North
Plymouth, Minnesota 55441-3601

July 15, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Quarterly Report
CC Docket 94-102
Broadband PCS Station KNLF641, Fargo, ND
Broadband PCS Station KNLF642, Grand Forks, ND
Transmission of E911 Calls from TTY Devices

Dear Ms. Dortch:

This report is filed pursuant to the directive contained in the Commission's *Fourth Report and Order*, (CC Docket 94-102), FCC 00-436, Released December 14, 2000 ("the *Fourth R&O*").¹

Minnesota PCS is a small carrier serving small urban markets and rural areas. It lacks any influence over the research and development activities of equipment manufacturers, and will rely wholly upon its equipment manufacturers to install (on a turnkey basis) the equipment necessary to allow its PCS system to process E-911 calls originating from Text Telephone ("TTY") devices.

As Minnesota PCS has advised the Commission in the past, it intends to obtain and install the equipment necessary for enhanced 911 services as soon as technically and economically feasible after it becomes available from equipment vendors. On June 28, 2002, Minnesota PCS requested a waiver of the Commission's E911 TTY rules due to financial impossibility, and submitted evidence consisting of financial statements under separate cover with a request for confidentiality.

Minnesota PCS has been informed by its equipment vendor, Motorola, that an upgrade to Minnesota PCS's current system would cost approximately \$1.8 million. Minnesota PCS serves

¹ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket 94-102, 15 FCC Rcd 25216 (December 28, 2000), ("Fourth Report and Order").

4,318 subscribers. The cost of the upgrade on a per subscriber basis would be nearly \$417. Minnesota PCS does not have the funding and does not expect to be able to obtain the funding to make such a costly upgrade feasible, and thus requested a waiver of the Commission's rules. Minnesota PCS's financial status has not changed since that waiver request was filed.

Respectfully submitted,

Minnesota PCS Limited Partnership

By: Nels Baden
Nels Baden
Officer, General Partner

**MINNESOTA PCS LIMITED PARTNERSHIP
E911 TTY Device Capability Report as of June 30, 2002**


Development Activities

1. **Network Infrastructure Software Development** – Minnesota PCS is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment.
2. **Handset Development and Testing Plans** – Our handset vendors continue to work on the development of a TTY capable handset. We will evaluate these phones when they become available.
3. **Beta Testing and Lab Testing** – Minnesota PCS is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, Minnesota PCS will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer's specifications.
4. **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.
5. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
6. **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Minnesota PCS continues to pressure its network and handset vendors to provide it with TTY compliant hardware and software.

Testing and Deployment Activities

7. **Carrier Coordination of Testing with PSAP** – Minnesota PCS will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
8. **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
9. **Retail Availability of Necessary Consumer Equipment** – Minnesota PCS is unable to determine the retail availability of consumer equipment, as none of the handset manufacturers has been able to release a date for general availability.

- 10. Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.


Richard Oakley,
Authorized employee